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The Trusted Integrator for Sustainable Solutions

REMOVAL SUPPORT TEAM 3
EPA CONTRACT EP-S2-14-01

RST 3-05-F-0041

TRANSMITTAL MEMO

To: Mr. Thomas Budroe, On-Scene Coordinator
Removal Action Branch
U.S. EPA, Region II

From: Smita Sumbaly, Data Reviewer
RST 3, Region II

Subject: Tonawanda Coke Site
Data Validation Assessment

Date: January 10, 2019

The purpose of this memo is to transmit the following information:

- Data validation results for the following parameters:
 - Asbestos PLM 5 Sample
- Matrices and Number of Samples
 - Bulk/Insulation 5 Samples
- Sampling Date: November 20, 2018

The final data assessment narrative and original analytical data package are attached.

cc: RST 3 SPM: Patrick Buster
RST 3 SITE FILE TDD #: TO-0370-0100
RST 3 ANALYTICAL TDD #: TO-0370-0107
TASK#: 5107



U. S. ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: January 10, 2019

TO: Thomas Budroe, On-Scene Coordinator
U.S. EPA, Region II

FROM: Smita Sumbaly
RST 3 Data Review Team

SUBJECT: QA/QC Compliance Review Summary

As requested quality control and performance measures for the data packages noted have been examined and compared to U.S. Environmental Protection Agency (EPA) standards for compliance. Measures for the following general areas were evaluated as applicable:

Data Completeness
Sample Collection, Holding Times, and Preservation
Blank Analysis
Sample Sensitivity
Monthly Report PLM Calibrations
Monthly Report TEM Calibrations

Any statistical measures used to support the following conclusions are attached so that the information may be reviewed by others.

Summary of Results

	<u>Asbestos</u>
	<u>PLM</u>
Acceptable as Submitted	<u>X</u>
Acceptable with Comments	<u> </u>
Unacceptable, Action Pending	<u> </u>
Unacceptable	<u> </u>

Data Reviewed by: Smita Sumbaly 

Date: 1/10/2019

Approved By: 

Date: 1/10/2019

Area Code/Phone No.: (732) 585-4410

NARRATIVE

Task No. 5107

SITE NAME: **Tonawanda Coke Site**
Tonawanda, Erie County, New York

Laboratory Name: **EMSL Analytical, Inc., 490 Rowley Road, Depew, New York 14043.**

INTRODUCTION:

The laboratory's portion of this case consisted of five bulk presumed asbestos-containing material (PACM) samples. Samples were collected on November 20, 2018. The EMSL Order ID number is 141806108.

The laboratory reported No problem(s) with the receipt of these samples.

The laboratory reported No problems with the analyses of Asbestos PLM samples.

The evaluator has commented on the criteria specified under each fraction heading. All criteria have been assessed, but no discussion is given where the evaluator has determined that criteria were adequately performed or require no comment. Details relevant to these comments are given on the following forms.

Appropriate Form Is and Chain of Custody have been copied from the original data package and appended to the data assessment narrative for reference.

Title: Evaluation of Asbestos Data
Data Assessment Narrative

RFP #: 509/Task#: 5107

Site: Tonawanda Coke Site

Contractor: Weston Solutions, Inc., Removal Support Team 3 (RST 3)

Reviewer: SMITA SUMBALY

Matrix/No. of Samples: Bulk/5

A.2.1 Validation Flags-

The following flags have been applied in red by the data validator and must be considered by the data user.

J-

This flag indicates the result qualified as estimated.

Red- Line-

A red-line drawn through a sample result indicates an unusable value. The red-lined data are known to contain significant errors based on documented information and must not be used by the data user.

Fully Usable Data-

The results that do not carry "J" or "red-line" are fully usable.

A.2.2 The data assessment is given below and on the attached sheets.

On November 20, 2018, U.S. Environmental Protection Agency (EPA) Region II and RST 3 personnel collected five bulk presumed asbestos-containing material (PACM) samples from the Tonawanda Coke Site located at Tonawanda, Erie County, New York. On the same day of collection, samples were hand-delivered to EMSL Analytical, Inc. located at 490 Rowley Road, Depew, New York 14043. The laboratory verified that the samples were received intact and properly custody sealed.

All five friable bulk PACM sample were analyzed by Polarized Light Microscopy (PLM) using the procedures from the PLM New York State (NYS) environmental laboratory approval program (ELAP) 198.1 Method. The PACM sample was found to contain asbestos and subject to a stratified point count method. Data was reported as percent (%) asbestos. The quantification limit for the method is less than (<) 1.0% (stratified point count/400 point count).

Client identification (ID) and laboratory ID numbers are as follows:

<u>Client ID No.</u>	<u>Laboratory ID No.</u>	<u>Matrix</u>	<u>Sampling Date</u>	<u>Analysis</u>
EMSL Order ID: 141805740				
TCBP-BULK027-01	141806108-0001	Bulk	11/20/2018	Asbestos PLM
TCBP-BULK028-01	141806108-0002	Bulk	11/20/2018	Asbestos PLM
TCBP-BULK029-01	141806108-0003	Bulk	11/20/2018	Asbestos PLM
TCBP-BULK030-01	141806108-0004	Bulk	11/20/2018	Asbestos PLM
TCBP-BULK031-01	141806108-0005	Bulk	11/20/2018	Asbestos PLM

Title: Evaluation of Asbestos Data
Data Assessment Narrative

Asbestos PLM analysis of Bulk by NY State ELAP 198.1:

All five friable bulk PACM samples were analyzed by PLM using the procedures from the PLM NYS ELAP 198.1 Method. PLM data for all samples were reported on a percent asbestos basis. All five samples were reported as none detected.

Quality Control (QC) Analysis

For QC purposes, the laboratory analyzed one inter-analyst via PLM NYS ELAP 198.1. Laboratory performed all QC in compliance with their Quality Assurance Manual. The laboratory also submitted PLM analyst accuracy form, PLM calibration and contamination record, and calibration of common RI oils.

A.2.3 Contract Problem/Non-Compliance:

Laboratory entered incorrect EMSL Order ID Number on the 1st page of the data package. Data reviewer manually corrected the EMSL Order ID number and initialed it.

Contractor Reviewer:


Signature:

1/10/2019
Date:

Verified by:


Signature:

1/10/2019
Date:

ASBESTOS DATA FOR BULK

Project: Tonawanda Coke Site
Sampling Date: November 20, 2018

PLM NYS Method 198.1 - Friable							
Client Sample ID Number	Laboratory Sample ID Number	Color	Non-Asbestos		Asbestos PLM NYS 198.1 Friable	Asbestos PLM NYS 198.6 NOB	Asbestos TEM NYS 198.4 NOB
			Fibrous	Non-Fibrous			
TCBP-BULK027-01	141806108-0001	Various	98.00% Glass	2.00% Non-fibrous (other)	None Detected	Not Analyzed	Not Analyzed
TCBP-BULK028-01	141806108-0002	Various	98.00% Glass	2.00% Non-fibrous (other)	None Detected	Not Analyzed	Not Analyzed
TCBP-BULK029-01	141806108-0003	Yellow	98.00% Cellulose	2.00% Non-fibrous (other)	None Detected	Not Analyzed	Not Analyzed
TCBP-BULK030-01	141806108-0004	Yellow	100.00% Glass	0.00% Non-fibrous (other)	None Detected	Not Analyzed	Not Analyzed
TCBP-BULK031-01	141806108-0005	Yellow	100.00% Glass	0.00% Non-fibrous (other)	None Detected	Not Analyzed	Not Analyzed

NOB - non-friable organically bound

EMSL ASBESTOS DATA PACKAGE
(ELAP#11606)

EMSL ORDER ID ~~140805377~~ 141806108

Weston Solutions

RFP # 509

TDD# TO-0370-0100

PREPARED BY: Rhonda McGee

DATE: December 27, 2018

2. Narrative

PLM Narrative

PLM Samples were prepped and analyzed via the NYSDOH-ELAP 198.1 method.

Samples were prepped for analysis using scalpel and forceps as well as appropriate RI Oil. Suspect asbestos fibers were identified using dispersion staining and the samples were quantified using visual estimation. NYS Stratified Point Count was performed according to NYSDOH-ELAP 198.1.

QA/QC for this method is 10% total sample load, there was 1 sample picked for QC from this sample set.

There were no problems encountered in the course of this project and no corrective actions taken.

1. Report

**EMSL Analytical, Inc.**

490 Rowley Road, Depew, NY 14043

Phone/Fax (716) 651-0030 / (716) 651-0394

<http://www.EMSL.com>buffalolab@emsl.com

EMSL Order: 141806108

CustomerID: RFWE53

CustomerPO:

ProjectID: RFP 509

Attn: **Smita Sumbaly**
Weston Solutions (King Georges Post)
1090 King Georges Post Road
Suite 201
Edison, NJ 08837

Phone: (732) 585-4400

Fax:

Received: 11/20/18 2:10 PM

Analysis Date: 11/21/2018

Collected: 11/20/2018

Project: RFP No. 509 / TDD # TO-0370-0100

Test Report:Asbestos Analysis of Bulk Material

Test	Analyzed Date	Color	Non Asbestos		Asbestos
			Fibrous	Non-Fibrous	
Sample ID	TCBP-BULK027-01	Description	BULK027		
	141806108-0001	Homogeneity	Homogeneous		
PLM NYS 198.1 Friable	11/21/2018	Various	98.00% Glass	2.00% Non-fibrous (other)	None Detected
PLM NYS 198.6 VCM					Not Analyzed
PLM NYS 198.6 NOB					Not Analyzed
TEM NYS 198.4 NOB					Not Analyzed
Sample ID	TCBP-BULK028-01	Description	BULK028		
	141806108-0002	Homogeneity	Homogeneous		
PLM NYS 198.1 Friable	11/21/2018	Various	98.00% Glass	2.00% Non-fibrous (other)	None Detected
PLM NYS 198.6 VCM					Not Analyzed
PLM NYS 198.6 NOB					Not Analyzed
TEM NYS 198.4 NOB					Not Analyzed
Sample ID	TCBP-BULK029-01	Description	BULK029		
	141806108-0003	Homogeneity	Homogeneous		
PLM NYS 198.1 Friable	11/21/2018	Yellow	98.00% Cellulose	2.00% Non-fibrous (other)	None Detected
PLM NYS 198.6 VCM					Not Analyzed
PLM NYS 198.6 NOB					Not Analyzed
TEM NYS 198.4 NOB					Not Analyzed
Sample ID	TCBP-BULK030-01	Description	BULK030		
	141806108-0004	Homogeneity	Homogeneous		
PLM NYS 198.1 Friable	11/21/2018	Yellow	100.00% Glass	0.00% Non-fibrous (other)	None Detected
PLM NYS 198.6 VCM					Not Analyzed
PLM NYS 198.6 NOB					Not Analyzed
TEM NYS 198.4 NOB					Not Analyzed
Sample ID	TCBP-BULK031-01	Description	BULK031		
	141806108-0005	Homogeneity	Homogeneous		
PLM NYS 198.1 Friable	11/21/2018	Yellow	100.00% Glass	0.00% Non-fibrous (other)	None Detected
PLM NYS 198.6 VCM					Not Analyzed
PLM NYS 198.6 NOB					Not Analyzed
TEM NYS 198.4 NOB					Not Analyzed

Report Amended 12/03/2018 17:01:39 Replaces the Initial Report. Reason Code: Data Entry-Change to Sample ID

**EMSL Analytical, Inc.**

490 Rowley Road, Depew, NY 14043

Phone/Fax (716) 651-0030 / (716) 651-0394

<http://www.EMSL.com>buffalolab@emsl.com

EMSL Order: 141806108

CustomerID: RFWE53

CustomerPO:

ProjectID: RFP 509

Test Report:Asbestos Analysis of Bulk Material

Test	Color	Non Asbestos		Asbestos
		Fibrous	Non-Fibrous	
Analyst(s)				
Tom Hanes				

Rhonda McGee, Laboratory Manager
or other approved signatory

NOB = Non Friable Organically Bound N/A = Not Applicable VCM = Vermiculite Containing Material

-In New York State, TEM is currently the only method that can be used to determine if NOB materials can be considered or treated as non-asbestos containing

All samples examined for the presence of vermiculite when analyzed via NYS 198.1.

-NYS Guidelines for Vermiculite containing samples are available at http://www.wadsworth.org/labcert/elapcert/forms/VermiculiteInterimGuidance_Rev070913.pdf

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. Samples were received in good condition unless otherwise noted.

This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government. This report may contain data that is not covered by the NVLAP accreditation.

Samples analyzed by EMSL Analytical, Inc. Depew, NY NYS ELA[®] 11606

4. Worksheets

Asbestos Analysis Of Bulk Materials using Polarized Light Microscopy With Point Counting

Special Instructions:

Email Results Only! THIS LOCATION DOES EPWORK ONLY! MUST HAVE RFP# For Bulks w/ layers, email Smita Sumbaly and give her # of layers and final sample count: S.Sumbaly@westonsolutions.com

Due Date 11/23/2018

Sample Number	141806108-0001			Analyst	thanes				
Customer Sample No.	TCBP-BULK027-01			Analysis Date	11/21/2018 02:34 PM				
Matrix	Bulk			Status	None Detected				
Sample Colors	Various	Homogeneity	Homogeneous	% Asbestos	0				
Treatment	Teased/Heated	Stereo Asb. Est.	0	% Non-Asb. Fibrous	98				
Texture	Fibrous	Temperature (C)	27.8	% Non-fibrous	2				
Comments									
Material	Pct	R.I. Perpend.	R.I. Parallel	Morphology	Elongation	Pleochroism	Birefringence	Fiber Color	Extinction
Glass	98						None 0.00 or Isotro		
Point counts:	SlideID	Non-asbestos	Chrysotile	Amosite	Crocidolite	Anthophyllite	Tremolite	Actinolite	

Sample Number	141806108-0002			Analyst	thanes				
Customer Sample No.	TCBP-BULK028-01			Analysis Date	11/21/2018 02:45 PM				
Matrix	Bulk			Status	None Detected				
Sample Colors	Various	Homogeneity	Homogeneous	% Asbestos	0				
Treatment	Teased	Stereo Asb. Est	0	% Non-Asb. Fibrous	98				
Texture	Fibrous	Temperature (C)	27.8	% Non-fibrous	2				
Comments:									
Material	Pct	R.I. Perpend.	R.I. Parallel	Morphology	Elongation	Pleochroism	Birefringence	Fiber Color	Extinction
Glass	98						None 0.00 or Isotro		
Point counts:	SlideID	Non-asbestos	Chrysotile	Amosite	Crocidolite	Anthophyllite	Tremolite	Actinolite	

Sample Number	141806108-0003			Analyst	thanes				
Customer Sample No.	TCBP-BULK029-01			Analysis Date	11/21/2018 02:45 PM				
Matrix	Bulk			Status	None Detected				
Sample Colors	Yellow	Homogeneity	Homogeneous	% Asbestos	0				
Treatment	Teased	Stereo Asb. Est.	0	% Non-Asb. Fibrous	98				
Texture	Fibrous	Temperature (C)	27.8	% Non-fibrous	2				
Comments:									
Material	Pct	R.I. Perpend.	R.I. Parallel	Morphology	Elongation	Pleochroism	Birefringence	Fiber Color	Extinction
Cellulose	98						None 0.00 or Isotro		
Point counts:	SlideID	Non-asbestos	Chrysotile	Amosite	Crocidolite	Anthophyllite	Tremolite	Actinolite	

Sample Number	141806108-0004			Analyst	thanes				
Customer Sample No.	TCBP-BULK030-01			Analysis Date	11/21/2018 02:46 PM				
Matrix	Bulk			Status	None Detected				
Sample Colors	Yellow	Homogeneity	Homogeneous		% Asbestos	0			
Treatment	Teased/Heated	Stereo Asb. Est.	0		% Non-Asb. Fibrous	100			
Texture	Fibrous	Temperature (C)	27.8		% Non-fibrous	0			
Comments:									
Material	Pct	R.I. Perpend.	R.I. Parallel	Morphology	Elongation	Pleochroism	Birefringence	Fiber Color	Extinction
Glass	100						None 0.00 or Isotro		
Point counts:	SlideID	Non-asbestos	Chrysotile	Amosite	Crocidolite	Anthophyllite	Tremolite	Actinolite	

Sample Number	141806108-0005			Analyst	thanes	
Customer Sample No.	TCBP-BULK031-01			Analysis Date	11/21/2018 02:47 PM	
Matrix	Bulk			Status	None Detected	

Asbestos Analysis Of Bulk Materials using Polarized Light Microscopy With Point Counting

Special Instructions:

Due Date 11/23/2018

Email Results Only! THIS LOCATION DOES EPWORK ONLY! MUST HAVE RFP# For Bulks w/ layers, email Smita Sumbaly and give her # of layers and

final sample count: S.Sumbaly@westonsolutions.com

Sample Colors	Yellow	Homogeneity	Homogeneous	% Asbestos	0				
Treatment	Teased	Stereo Asb. Est.	0	% Non-Asb. Fibrous	100				
Texture	Fibrous	Temperature (C)	27.8	% Non-fibrous	0				
Comments									
Material	Pct	R.I. Perpend.	R.I. Parallel	Morphology	Elongation	Pleochroism	Birefringence	Fiber Color	Extinction
Glass	100						None 0.00 or Isotro		
Point counts:	SlideID	Non-asbestos	Chrysotile	Amosite	Crocidolite	Anthophyllite	Tremolite	Actinolite	

5. Quantification

PLM Quantification

The point count result was arrived at by superimposing a point count graticule into the field of view of the sample. Points were then counted on each of 4 preps until 1 positive (asbestos) point was reached. The number of total points counted was then recorded as well as the type of asbestos. The three remaining preps are counted in the same manner. All data is then combined and the number of positive points is then divided by the total number of points counted to reach the final result.

Calculations:

Prep 1 - 1 chrysotile point in 2 total points
Prep 2 - 1 amosite point in 2 total points
Prep 3 - 1 chrysotile point in 2 total points
Prep 4 - 1 amosite point in 5 total points

Results

2 chrysotile points in 11 total points = $2/11 * 100 = 18\%$ chrysotile
2 amosite points in 11 total points = $2/11 * 100 = 18\%$ amosite.

3. Chain of Custody

Weston Solutions

DateShipped: 11/20/2018

CarrierName: Hand Delivered

Airbiline:

CHAIN OF CUSTODY RECORD

Site #: A28U

Contact Name: Patrick Buster

Contact Phone: 908-565-2985

No: 2-112018-112850-0010

Cooler #: 1

Lab: EMSL Analytical

Lab Phone: 716-651-0030

201908171

[illegible]

Special Instructions: Please send analytical results to

S.Sumbaly@WestonSolutions.com, Patrick.Buster@WestonSolutions.com, Ben.Nwosu@WestonSolutions.com

TAT: 48 hours preliminary.

RFP# 509

SAMPLES TRANSFERRED FROM

CHAIN OF CUSTODY #

Items/Reason	Relinquished by (Signature and Organization)	Date/Time	Received by (Signature and Organization)	Date/Time	Sample Condition Upon Receipt
cell analysis	Meredith Fordwith Western RSTB	11/20/18 1300			
			RECEIVED NOV 20 2018		
			BY: cy 2:10pm W.I.		